



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
Wireless Telecommunications Bureau and	)	WT Docket No. 24-240
Office of Engineering and Technology Seek	)	
Comment on NextNav Petition for Rulemaking	)	RM-11989
	)	

Nice North America LLC (“Nice”), a company that employs over 400 people across the United States, designs, manufactures, and markets Residential Life Safety & Security Systems, Smart Homes/Buildings Devices, Garage Door & Gate Automation Products and Access Control Systems. Nice has been utilizing the 902-928MHz band for its products since 2009.

We are deeply concerned about the potential negative impacts of NextNav’s proposal on our products operating in the 902-928MHz unlicensed band. This proposal will severely compromise existing device networks in homes and businesses across the United States, as well as stifle innovation and competition.

Nice is actively manufacturing eighteen (18) Part 15 unlicensed devices and sold over six million (6,000,000) devices that have been deployed into U.S. households and businesses operating in the 902-928MHz band. NextNav’s proposal threatens the continuing operation of these devices, as well as our ability to develop new products that interoperate with our existing device ecosystem.

The removal of the interference testing requirements for Part 15 devices is an existential threat to our device ecosystems. The nationwide creation of a high-power service such as a PNT network in the 902-928 MHz band would disrupt the low-power communications our devices rely on for safe and efficient operations. The performance and range of our device ecosystem would be decimated, undermining the capabilities promised to our customers and users.

Accommodating our devices in another spectrum band is unacceptable. The current band was chosen to avoid interference with other wireless protocols frequently used in household and office settings, such as Wi-Fi and Bluetooth. Relocating an entire ecosystem to another spectrum band would reduce reliability and eliminate backwards compatibility with currently deployed devices.



If accepted, this proposal would have a devastating impact on U.S. consumers. Millions of households and businesses rely on our devices for essential functions like security, home automation, and access. Forcing Nice to redesign our products would cost tens of millions of dollars in development, design, and manufacturing; in addition, it would take more than a decade to establish a comparable ecosystem. These costs would inevitably be passed on to consumers. Moreover, the disruption caused by replacing millions of devices would be unprecedented. Consumers would face inconvenience, added expense, and potential security risks as they transition to new, incompatible systems.

Despite the fact our devices have operated in this band for the past 15 years, we have not received any outreach from NextNav to discuss mitigation strategies. The lack of any specific strategies to ensure co-existence with existing Part 15 devices in the NextNav proposal, as well as the request to eliminate interference protections, would compel a future in which our devices are effectively crowded out of the 902-928 MHz band.

Nice North America LLC urges the FCC to consider the broader implications of NextNav's proposal for U.S. consumers and businesses. Maintaining the current 902-928MHz band is essential not only for protecting the small businesses that contribute to the American economy but also for ensuring a vibrant and competitive technology landscape that benefits all – including American consumers.

Thank you for your attention to this critical issue.

Nice North America, LLC

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